

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kyle Kapron, being duly sworn, hereby state the following:

1. Since 2022, I have been a Special Agent with the Federal Bureau of Investigation (“FBI”). I am currently assigned to the Philadelphia Field Office’s domestic terrorism squad, where I investigate threats to critical infrastructure and aviation, among other matters. I have assisted other law enforcement officers and agents in the execution of arrest and search warrants.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging defendant Dulce Huertas, date of birth August 1, 1963, with violations of 49 U.S.C § 46504 (interference with flight crew members and attendants), 49 U.S.C § 46506(1) (simple assault in the special aircraft jurisdiction of the United States), and 49 U.S.C § 46506(2) (indecent exposure in the special aircraft jurisdiction of the United States).

3. This affidavit is based upon my personal knowledge, experience, and investigation, including information directly related to me or related through reports of law enforcement officers in the course of their official duties as well as videos provided by flight passengers. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint, I have not included all information known by me or other law enforcement officers concerning this investigation. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date asserted.

4. On November 20, 2023, Dulce Huertas (“HUERTAS”) was a passenger on Frontier Airlines flight 4944, from Orlando, Florida to Philadelphia, Pennsylvania. During the flight, flight attendants served HUERTAS two alcoholic drinks.

5. Also during the flight, as the plane was about to land at Philadelphia International Airport, Frontier flight attendant R.G. observed HUERTAS get out of her seat and stand. HUERTAS stated, “I have to pee.” R.G. told HUERTAS that she needed to stay seated. HUERTAS began yelling and cursing at R.G. HUERTAS then sat down in her seat.

6. After the plane landed and was taxiing to the gate, HUERTAS began cursing at passengers around her. R.G. asked flight attendant M.P. to call security to assist at the arrival gate. M.P. called the captain and explained the situation. The captain made an announcement instructing all passengers to remain seated.

7. Once the plane arrived at the gate and the seatbelt sign was turned off – but before any external doors were opened to allow passengers to leave the aircraft – HUERTAS resumed her aggressive behavior and pushed passengers out of the way as she moved to the front of the plane.

8. HUERTAS approached the forward lavatory but was stopped by the flight attendants as they were disarming the main cabin door. HUERTAS then stated, “Sorry, everybody,” and pulled her pants and underwear down as she squatted as if to urinate in the aisle. HUERTAS displayed her anus and genitalia. (Notably, there were children nearby.) HUERTAS did not urinate, and then stood up and pulled her underwear and pants back up. HUERTAS then cursed at passengers.

9. HUERTAS again approached the front of the plane and told flight attendant S.K., “Let me pass, let me pass.” S.K. stood in the way of HUERTAS, in order to allow M.P. to disarm the external (main cabin) door. At this time, M.P. was concerned that HUERTAS would open one of the external doors and activate an emergency slide. In her attempt to get past S.K., HUERTAS used her belly to bump S.K. However, HUERTAS was unsuccessful in getting past S.K. HUERTAS continued to yell, curse, and threaten to kill multiple passengers, including passenger J.H.


10. Based on the above, I have probable cause to believe that on November 20, 2023, in the Eastern District of Pennsylvania, Dulce Huertas committed violations of 49 U.S.C § 46504 (interference with flight crew members and attendants), 49 U.S.C § 46506(1) (simple assault in the special aircraft jurisdiction of the United States), and 49 U.S.C § 46506(2) (indecent exposure in the special aircraft jurisdiction of the United States).

/s/ Kyle Kapron

Kyle Kapron
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 29 day of January, 2024 at 5:12 p.m.

Pamela A.
Carlos



Digitally signed by Pamela
A. Carlos
Date: 2024.01.29 17:13:27
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HONORABLE PAMELA CARLOS
United States Magistrate Judge